

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., and  
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Civil Action No. 2:24-cv-00627-JRG-RSP

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR  
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT AND  
WAIVER OF FOREIGN SERVICE REQUIREMENT**

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., Defendants herein, without waiving any defenses described or referred to in Rule 12 F.R.C.P., move the Court to extend the time within which Defendants are required to move, answer, or otherwise respond to Plaintiff's Complaint. In support of their Motion, Defendants state as follows:

1. On August 2, 2024, Plaintiff filed its Complaint alleging patent infringement against Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.
2. On August 5, 2024, Defendant Samsung Electronics America, Inc. was served with Plaintiff's Complaint. Samsung Electronics Company, Ltd. has not yet been served.
3. Counsel for Defendants has agreed to waive service under the Hague Convention for Samsung Electronics Company, Ltd., a foreign entity, in exchange for a 91-day extension of time for all defendants to answer or otherwise plead by November 25, 2024.
4. Defendants' agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including, for instance, Defendants' right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

WHEREFORE, Defendants Samsung Electronics Company, Ltd. and Samsung Electronics America, Inc., respectfully request that the time in which they are required to move, answer, or otherwise respond to Plaintiff's Complaint for Patent Infringement be extended up to and including November 24, 2024.

Dated: August 26, 2024

Respectfully submitted,

*/s/ Melissa R. Smith*  
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*Attorney for Defendants*  
*Samsung Electronics Company, Ltd., and*  
*Samsung Electronics America, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 23<sup>rd</sup> day of August, 2024.

*/s/ Melissa R. Smith*  
Melissa R. Smith

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Defendants met and conferred with counsel for Plaintiff. Counsel for Plaintiff indicated that it is unopposed to this motion.

*/s/ Melissa R. Smith*  
Melissa R. Smith